

UNITED STATES DISTRICT COURT

for the

Filed 10-4-12
 Clerk, U. S. District Court
 Western District of Texas
 By ae
 Deputy

United States of America
 v.
 IGNACIO RAMIREZ, BRYAN RAMIREZ,
 JIMMI RAMIREZ, JAIME RODRIGUEZ,
 RAMIRO GAMEZ

Case No.

SA-12-980M*Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of OCTOBER 3, 2012 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

21 USC 846, 841(a)(1), & 841(b)(1)
 (C)

Conspiracy to Possess and Possession with Intent to Distribute 50 Kilograms
 or more but less than 100 Kilograms of Marijuana.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.


Complainant's signature

Special Agent GUADALUPE SEPULVEDA, HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/04/2012


Judge's signature

City and state: SAN ANTONIO, TEXAS

PAMELA A. MATHY, U.S. Magistrate Judge

*Printed name and title*1

ATTACHMENT "A"

AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT

GUADALUPE SEPULVEDA, BEING DULY SWORN, DEPOSES AND
SAYS:

I am a Special Agent with the Homeland Security Investigations (HSI) of the Department of Homeland Security, currently assigned to the San Antonio Field Office. In addition to the basic law enforcement training I have also received advanced training regarding the controlled substance laws of the State of Texas and the United States. I have in the past been the affiant on affidavits in support of arrest warrants and complaints in federal courts.

1. On October 3, 2012, HSI agents obtained information from a confidential source (CS) that a large quantity of narcotics was being delivered to San Antonio from a source supply in Mexico. According to the information the individuals bringing the narcotics were at the IHop Restaurant located at Marbach Rd. and Loop 410, San Antonio, Texas. At approximately 8:20 Agents went to that location and entered the IHop. Agents observed 5 subjects sitting at table. The subjects later identified as IGNACIO RAMIREZ, JIMMI RAMIREZ, BRYAN RAMIREZ, RAMIRO GAMEZ, and JAIME RODRIGUEZ appeared to waiting for something. During the

time they were being observed they made several phone calls. At approximately 9:00 AM they were observed exiting the Restaurant and stood outside for approximately 25 minutes. Surveillance then observed the individuals depart in two vehicles. RODRIGUEZ was observed driving a White Ford F250 pickup and was by himself. The other four subjects entered a Gold Chevrolet Tahoe that was being driven by IGNACIO RAMIREZ. The two vehicles drove away from the location in tandem. Surveillance was discontinued on the two vehicles.

2. At approximately 10:20 AM the source of information reported that the individuals with the narcotics were located at an HEB store located at the intersection of Zarzamora and S.W. Military Dr., San Antonio, Texas. Agents went to that location and observed the same individuals and the same two vehicles observed at the IHOP. According to the source information the subjects were lost and waiting on someone to guide them to the "stash location". At approximately 11:15 AM agents observed the subjects meeting with the driver of white Chevrolet pickup. The white Chevrolet left the location being followed by the white Ford and the Gold Tahoe. Agents requested assistance from the San Antonio Police Department to conduct a traffic stop of the vehicles. At the location of IH -35 North Bound near the Malone St exit the SAPD Officers were able to stop the Ford pickup and the Tahoe. The driver of the white Ford pickup identified as

JAIME RODRIGUEZ did not have a driver's license and was placed under arrest. Incident to his arrest the pickup was searched. In the cab of the pickup Officers observed a blanket on the floorboard extending from the center of the seat to the passenger door. Underneath the blanket were two large brown taped wrapped bundles that contained marijuana. Two additional bundles were found behind the seat. In the bed of the pickup Officers found two green duffle bags, each containing multiple bundles of marijuana. The total gross weight of the marijuana was 205.4 lbs. A field tested was conducted with a positive result for marijuana. Additionally Officers found an empty envelope in the Ford pickup addressed to BRYAN RAMIREZ.

3. RODRIGUEZ was advised of his rights and agreed to talk to Agents. RODRIGUEZ stated he was a citizen of Mexico and was illegally in the United States. He claimed that the individuals who had smuggled him in to the United States had offered to waive a \$2,500 fee for the smuggling if he transported the marijuana to San Antonio. According to RODRIGUEZ he had arrived at the IHOP restaurant with an unknown subject and met up with the individuals in the Tahoe. The subjects in the Tahoe were advised of their rights and made following statements.

4. IGNACIO RAMIREZ denied knowledge of the marijuana denied meeting with anyone at the IHOP. When confronted with fact that he had been seen at the IHOP with the driver of the load vehicle,

RAMIREZ recanted his story and claimed that the driver was lost and he was helping the driver with directions, but could not explain why he was following the driver at the time of the stop.

5. BRYAN RAMIREZ claimed no knowledge of what was going on, but could not explain why the envelope addressed to him was in the load vehicle.

6. JIMMI RAMIREZ denied knowledge.

7. RAMIRO GAMEZ agreed to talk to Agents and admitted his involvement with the marijuana load. According to GAMEZ he went to IGNACIO RAMIREZ's house in Eagle Pass, Texas and met with IGNAICO RAMIREZ, BRYAN RAMIREZ, JIMMI RAMIREZ, and JAIME RODRIGUEZ. According to GAMEZ, he spent the night at the house, and witnessed the marijuana being delivered. GAMEZ further stated that the marijuana was loaded in to the load vehicle by BRYAN and JIMMI RAMIREZ. According to GAMEZ, they left Eagle Pass in the vehicles at approximately 5:00 AM.

Affiant further sayeth not.


S/A GUADALUPE SEPULVEDA, HSI

Subscribed and sworn to on this the 4th day of October, 2012.


PAMELA A. MATHY
UNITED STATES MAGISTRATE JUDGE